

FILED

JUN 14 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION

JANE DOE, by her next friend Anthony E.
Rothert,

Plaintiff,

v.

MICHELLE CHAPMAN, in her official
capacity as Circuit Clerk for Randolph County,

Defendant.

Case No. 2:19-cv-00025-CDP
Currently a Sealed Matter

Motion for Ex Parte Temporary Restraining Order

Under Fed. R. Civ. P. 65(b)(1) and for the reasons provided in the accompanying memorandum in support and its exhibits, Plaintiff requests a temporary restraining order without notice to Defendant. Plaintiff seeks a limited order:

- A. Prohibiting Defendant and her agents and employees from revealing Plaintiff's name or identifying information or characteristics to anyone other than the Court;
- B. Prohibiting Defendant and her agents and employees from providing the portion of any record that contains Plaintiff's name or any of her identifying information to anyone other than the Court, including if requested via a public-records request;
- C. Requiring Defendant to inform her agents and employees of this order, if granted, and to command them to comply with it;
- D. Ordering that the U.S. Marshal serve upon Defendant any temporary restraining order that is issued along with the Complaint and Summons; and
- E. Any other relief the Court finds just and appropriate.

Doe requests that this relief be imposed solely until appropriate, effective measures to protect her anonymity can be put in place, in consultation with Defendant. Doe intends to serve process upon Defendant expeditiously after the Court rules upon her motion.

Given the low risk of any financial harm to Defendant, Doe requests that bond be set at \$100. *See* Fed. R. Civ. P. 65(c) (security bond should be “in an amount that the court considers proper to pay the costs and damages sustained by any party found to have been wrongfully enjoined or restrained”).

Respectfully submitted,

/s/ Anthony E. Rothert

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